

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,                     )  
   )  
                  Plaintiff,                         )  
   )  
vs.   ) Case No.: 4:18-cr-975-CDP (JMB)  
   )  
CHRISTOPHER MYERS,                         )  
   )  
                  Defendant.                        )

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

COMES NOW Defendant, Christopher Myers, by and through counsel, and, pursuant to 18 U.S.C. § 3142(c)(3), hereby moves this Court to amend release condition 7(f) and allow him to reside at a new address already provided to his pretrial service officer,<sup>1</sup> rather than the Columbia Avenue address identified in the Order Setting Conditions of Release. In support of this motion, Defendant states as follows:

1. On November 30, 2018, Defendant surrender to the United States Marshals Service.
2. On that same date, this Court released Defendant on his own recognizance and a combination of conditions of release designed to reasonably assure his appearance as required and the safety of any other person and the community.
3. Condition 7(f) is among the conditions this Court imposed.
4. Condition 7(f) requires Defendant to live at a specified address on Columbia Avenue.
5. Defendant has sold the Columbia Avenue home identified in condition 7(f) and

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<sup>1</sup> In an exercise of caution, counsel has not included Defendant's new address in this motion. As noted above, pretrial services officer Jameka Taylor has this new address, which is within the Eastern District of Missouri.

can no longer live there.

6. Defendant has already provided his new address to pretrial officer Jameka Taylor.
7. Defendant, through counsel, has discussed this matter with Assistant United States Attorney Carrie Costantin.
8. Ms. Costantin does not object to Defendant's request.
9. Defendant, through counsel, has also discussed this matter with pretrial officer Jameka Taylor.
10. Ms. Taylor does not object to Defendant's request.

WHEREFORE, Defendant respectfully requests this Court amend condition 7(f) and, pursuant to 18 U.S.C. § 3142(c)(3), permit him to reside at the address already provided to his pretrial services officer, rather than the Columbia Avenue address identified in the Order Setting Conditions of Release.

Respectfully submitted,

ROSENBLUM, SCHWARTZ & FRY, PC

By: */s/ Adam D. Fein*

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2021, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Carrie Costantin, Assistant United States Attorney.